

Gregory Armstrong

From: Randall Slade <randall.slade@francomoroney.com>
Sent: Wednesday, February 8, 2023 9:15 AM
To: Gregory Armstrong
Cc: John Moroney; Robert Franco
Subject: Complaint of Chicago AquaLeisure and Theresa Tran; Case No. 1:22cv06478
Attachments: Complaint 11-28-22.pdf; Request for Entry of Default.pdf; #13 Notice of Complaint for Exoneration from or Limitation of Liability.pdf; #11 Order restraining all suits and directing monition to issue.pdf

Mr. Armstrong,

Please be advised that we represent Chicago Aqualeisure, LLC and Theresa Tran with respect to an incident occurring on August 13, 2022 on Lake Michigan. We understand that you represent Jacob Houle with respect to the claimed incident. Please be advised that on November 18, 2022, we filed the attached Complaint in Admiralty for Exoneration from or Limitation of Liability to the above incident. On November 28, 2022, Judge Joan B. Gottschall of the United States District Court for the Northern District of Illinois entered the attached Order related to the Petition, and the Clerk of Court entered the attached Notice. Pursuant to the Order, any claims were required to be filed with the United States District Court on or before January 25, 2023. We have also filed the attached Request for Default earlier this week, which has not been ruled upon but will be amended to identify your client's potential claim, which our office just became aware of.

Please let me know if you have any questions or need anything further.

Thank you,

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Houle motion
to Enlarge
ExH "A"

Gregory Armstrong

From: Gregory Armstrong
Sent: Monday, January 30, 2023 3:25 PM
To: karen.songdahl@sedgwick.com
Subject: Our Client: Houle, Jacob; Your insured: Tran, Theresa , Aqualeisure; D/L: 8-13-22; Sedgwick File #NMA22002050
Attachments: Houle.Complaintatlaw.pdf; Houle.ER.invoice.pdf; Houle.photo.injury.jpg

Karen:

Pursuant to our conversation today, please be advised that we represent Mr. Jacob Houle with regard to the above claim. Mr. Houle was on a third vessel, *Giddy Up* that was anchored in a line south of the vessel *Navigator*. The vessel *La Aqua Vida* struck *Navigator* and propelled it into the back of the vessel *Giddy Up*. Jacob was on the swim platform. Jacob's right arm was severely lacerated by the bow anchor windlass of *Navigator*, before it was pushed back. Mr. Houle had to return to shore and seek ER care at Northwestern, including Xrays and stitches to the lacerations. There is permanent scarring.

There is a video of this incident showing the bow striking the back of *Giddy Up* and injuring Mr. Houle, and it is included in the IDNR report. If you do not already have it, please advise and we will get it to you.

We are attaching the draft unfiled Complaint which sets forth in the detail the specific facts and allegations for your review and consideration. We have also attached the ER bill and a photo to provide some initial substantiation to this claim. We will of course hold off filing the Complaint to provide Sedgwick with enough time to fully investigate and evaluate this claim.

My understanding is that you will forward this email with attachments to Mr. Boulon and we will go from there.

Thanks again!

Very truly yours,

Gregory C. Armstrong

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